

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

EON CORP. IP HOLDINGS, LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 10-812 (RGA)
	)	
FLO TV INCORPORATED, et al.,	)	
	)	
Defendants.	)	

**STIPULATION AND ~~PROPOSED~~ ORDER  
REGARDING SUMMARY JUDGMENT AND DAUBERT BRIEFING**

WHEREAS there are nine remaining defendants in this action, who offer diverse products and services;

WHEREAS the original Scheduling Order entered in this case (D.I. 152) does not contain any parameters on the number or length of summary judgment or *Daubert* motions to be filed;

WHEREAS the parties have met and conferred to propose reasonable briefing limits to reduce the burden on the Court while recognizing the unique interests of the various parties in advance of the November 1, 2013 deadline for filing such motions;

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel and subject to the approval of the Court, that the following parameters shall govern the parties' respective summary judgment and *Daubert* briefs in this matter:

Plaintiff shall file no more than:

1. One opening brief on validity, not to exceed 30 pages.
2. One additional opening summary judgment brief, not to exceed 20 pages.
3. Two *Daubert* briefs, not to exceed 20 pages each.

Defendants shall file no more than:

1. One non-infringement brief on issues common to all Defendants, not to exceed 30 pages.
2. Each defendant may file an additional non-infringement brief on individual issues, not to exceed 7 pages.
3. One common invalidity brief, not to exceed 20 pages.
4. One common *Daubert* brief, not to exceed 20 pages.

The parties further agree that the page limits for an answering brief shall be equal to that of the respective opening brief. The page limits for a reply brief shall be one-half the length of the respective opening brief, with up to 4 pages for each of the individual non-infringement reply briefs.

FOX ROTHSCHILD LLP

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Gregory B. Williams

Gregory B. Williams (#4195)  
919 N. Market Street, Suite  
1300 Wilmington, DE 19801  
(302) 622-4211  
gwilliams@foxrothschild.com  
*Attorneys for Plaintiff EON Corp. IP  
Holdings, LLC*

/s/ Karen Jacobs

Karen Jacobs (#2881)  
Jennifer Ying (#5550)  
Megan E. Dellinger (#5739)  
1201 North Market Street P.O. Box 1347  
Wilmington, DE 19899-1347  
(302) 658-9200  
kjacobs@mnat.com  
jying@mnat.com  
mdellinger@mnat.com  
*Attorneys for Defendants Sprint Nextel  
Corporation, HTC America, Inc., and Simplicity,  
LLC d/b/a Wirefly*

POTTER ANDERSON & CORROON, LLP RICHARDS, LAYTON & FINGER, P.A.

/s/ David E. Moore

Richard L. Horwitz (#2246)  
David E. Moore (#3983)  
1313 N. Market Street, 6th Floor  
Wilmington, DE 19801  
(302) 984-6000  
rhorwitz@potteranderson.com  
dmoore@potteranderson.com  
*Attorneys for Defendants FLO TV  
Incorporated and Qualcomm Inc.*

/s/ Steven J. Fineman

Steven J. Fineman (#4025)  
One Rodney Square  
920 N. King Street  
Wilmington, DE 19801  
(302) 651-7700  
fineman@rlf.com  
*Attorneys for Defendant United States Cellular  
Corporation*

FARNAN LLP

/s/ Brian Farnan

Brian Farnan (#4089)  
919 North Market Street  
12th Floor  
Wilmington, DE 19801  
(302) 777-0300  
bfarnan@farnanlaw.com  
*Attorneys for Defendant MobiTV Inc.*

/s/ Jennifer Ying

Jack B. Blumenfeld (#1014)  
Jennifer Ying (#5550)  
1201 North Market Street  
P.O. Box 1347  
Wilmington, DE 19899-1347  
(302) 658-9200  
jblumenfeld@mnat.com  
jying@mnat.com  
*Attorneys for Defendant Motorola Mobility LLC*

FISH & RICHARDSON, P.C.

/s/ Thomas Lee Halkowski

Thomas Lee Halkowski (#4099)  
222 Delaware Avenue  
17th Floor  
Wilmington, DE 19801  
(302) 652-5070  
halkowski@fr.com  
*Attorneys for Defendant LG Electronics  
MobileComm USA Inc.*

October 30, 2013  
7735332

SO ORDERED on this 31<sup>st</sup> day of October, 2013.

  
\_\_\_\_\_  
U.S.D.J.